



211 LA COUNTY

INFORMATION AND REFERRAL FEDERATION OF LOS ANGELES COUNTY
Serving Los Angeles County since 1981

April 30, 2019

Chasel Lee
Regulatory Analyst
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

SUBJECT: Initial CPUC questions regarding disaster-only 2-1-1 proposal

Dear Mr. Lee:

Thank you for the opportunity to respond to the questions and concerns set forth in your letter dated April 17, 2019, regarding the proposal of the Information and Referral Federation of Los Angeles County (dba 211 LA) and its network partners to implement disaster-only 2-1-1 service in all 19 unserved counties across the state that are currently without 2-1-1 service providers. Please do not hesitate to call or email me if you have any additional questions about our proposal or the responses provided below.

1. Regarding your response to Question 2.7, which counties are included in the Disaster Portal?

Under our proposal, 211 LA would develop, maintain and administer the Disaster Portal for use by the 19 counties that are currently unserved. Authorized users in each of those counties will be able to access the portal on a 24/7 basis to activate the disaster-only 2-1-1 service network, share disaster-related information with the network's 2-1-1 service providers and the public, deploy online forms, and utilize the portal's other capabilities, as described in our responses to Questions 2.7, 2.9, 2.11, 3.2, and 3.6 in the Commission's Request for Proposals (RFP).

Would it be limited to the currently unserved counties, or does it include counties with full-service 2-1-1 dialing?

Under our proposal, use of the Disaster Portal would be limited to the 19 currently unserved counties. As noted in our response to Question 1 above, authorized users in each of those counties would be able to access the portal on a 24/7 basis. If they wished to do so, the 19 counties could conceivably allow other counties to access the portal. However, as discussed in our response to RFP Question 3.7, the disaster-only 2-1-1 network partnership will incur costs upon the activation of the network in response to a disaster. We have proposed that 211 LA and its disaster-only 2-1-1 network partners be reimbursed for such costs using any monies that remain in the Senate Bill 1212 fund after the disaster-only 2-1-1 systems technical implementation stage. However, the availability of such monies is uncertain. Accordingly, our recommendation is that

authorized users (entities with the authority to activate the disaster-only 2-1-1 service network) be limited to the 19 counties. Alternatively, other counties could be allowed to appoint authorized users, provided the other counties agree to abide by the 2-1-1 disaster services activation pricing schedule set forth in response to Question 3.7. Short of that, other counties could be permitted to access the portal with restricted rights (e.g., viewing and submitting resource information only, without the ability to activate the disaster-only 2-1-1 service network).

2. Regarding your response to Question 2.8, with whom will 2-1-1 partners in your network sign MOUs?

The disaster-only 2-1-1 service network's partners (as listed in Section 1.1 of our proposal) will sign MOUs with 211 LA, in its capacity as lead agency, to establish agreements governing the partnership's activities, the timeframe for delivering the desired outcomes, details of exactly how each party will collaborate (e.g., regular in-person meeting, conference calls, written approval of all activities by parties), and to facilitate and ensure a smooth working relationship between the partners for the network's start-up/implementation phase and during delivery of disaster-only 2-1-1 services.

3. Regarding your response to Question 2.9, Decision 11-09-016 does not permit reassignment of the lead agency in your collaborative/partner network. In accordance with the Decision, the CPUC plans to approve only one agency – the lead agency – and if the CPUC decides to accept your proposal, it will only approve 211 Los Angeles County. How do you wish to proceed with this item?

Thank you for pointing out this inadvertent ambiguity in our proposal. To be clear, 211 LA will act as the proposed disaster-only 2-1-1 service network's lead entity with respect to all the duties specified in Section 5 of the *Final Rules Governing Appointment of 211 Service Lead Entity, Duties of Lead Entity, and Oversight of Lead Entity* adopted in D.11-09-016. 211 LA will never designate any of its network partners to act as the lead entity with respect to any such duties. However, as we intended to convey in our proposal, 211 LA may, when appropriate, designate one of its network partners to *assist* with information entry/management tasks during a disaster, such as where, due to geographical proximity, the partner is best suited to assimilate and process, under 211 LA's supervision, disaster-related information conveyed by local authorities and relief agencies. To clarify this point, please accept the following correction to the last sentence of the third paragraph in our response to RFP Question 2.9: "However, 211 LA may designate a network partner/s to ~~serve in this capacity~~ **assist with this task** when appropriate."

4. Regarding your response to Question 2.10, the recording as proposed is insufficient. The recording must be able to forward the caller to the appropriate responder in some fashion.

Thank you for pointing out this deficiency in our proposal. We will comply with this requirement using the inContact phone menu system, which will be programmed to enable callers to select an option that will transfer them to the appropriate responder. Please also accept the following revision to the last sentence in our response to RFP Question 2.10: “Messaging will include a county provided disaster reporting number, as well as an automated option to be transferred to the number, which the public can utilize in the event they need to report a disaster or provide disaster information.”

5. Regarding your response to Question 2.12, will 211 LA County develop protocols and practice exercises that reflect the required understanding and knowledge of municipal disaster regulations?

We assume that by “municipal disaster regulations,” you are referring to municipal ordinances that concern declared disasters. By and large, such ordinances are specific to local first responders and public agencies with disaster relief responsibilities. Less frequently, such ordinances may concern large industrial facilities and public infrastructure projects (e.g., petroleum refineries, cement factories, dams and levees) that could precipitate or be affected by local disasters. Generally, such ordinances have no relation to, or direct impact on, the provision of 2-1-1 services. However, 211 LA will consult and coordinate with local authorities in all 19 counties to be served by the proposed disaster-only 2-1-1 service network to ensure that 211 LA and its network partners have the “required knowledge and understanding” of all municipal ordinances that are relevant to the provision of disaster-only 2-1-1 service in those locales. In addition, 211 LA will ensure that the protocols and practice exercises that are developed and implemented for the disaster-only 2-1-1 service network are informed by and take into account all such regulations.

6. Regarding your response to Question 2.13, the list includes only five 2-1-1 service providers in California. How will the 2-1-1 network as a whole be utilized during disasters under your proposal?

211 LA and its network of five network partners currently serve twelve counties, providing 2-1-1 services for nearly 50% of the state’s population. In 2018, we collectively handled a total of 593,620 transacted contacts, which is just over 47% of 2-1-1 contact support for the entire state of California. 211 LA carefully selected its network partners based on both their capabilities and geographic locations, to ensure our network will be able to provide disaster-only 2-1-1 service to all 19 currently underserved counties. Our experience, well-established partnership, infrastructure, and geographic coverage makes this collaborative best positioned to quickly respond in the case of local or regional disasters affecting one or more of the 19 unserved counties.

Your question seems to posit a collaboration among *all* existing 2-1-1- service providers to provide disaster-only 2-1-1 service to the 19 currently unserved counties. That is very different from what we understood the RFP to be contemplating. If, however, that is what the Commission now desires, 211 LA and its network partners are open to having

any and all other 2-1-1 service providers join our disaster-only 2-1-1 service network (subject to the same MOU as 211 LA's other network partners) and receive compensation per the activation pricing schedule included in our response to RFP Question 3.7 when they assist in a collaborative disaster response/recovery effort.

7. Regarding your response to Question 3.2:

- a. Considering that most 2-1-1 providers use inContact or similar systems, how would these providers access the information on your proposed Disaster Portal?

InContact is a telephone system that is used by the 2-1-1 agents to handle calls/texts/chats; it does not connect to the proposed Disaster Portal. 211 network partners will receive resource information placed in the Portal through integration with iCarol and 211LinQ using an application programming interface (API) that links these 211 provider systems with the curated resource referral database that will be created as a component of the Disaster Portal.

211s across the country use a variety of database systems and this has never been a barrier to using other 211s to handle disaster overflow calls. 211 LA in particular has had much experience sharing resource referral information with network partners during disasters in other states and has not encountered a situation where a network partner was unable to access/receive referral information in a timely fashion during an activation incident. The Disaster Portal provides a more effective and efficient way to share information because it consolidates all activities to a single point of reference.

- b. As previously mentioned, Decision 11-09-016 does not permit reassignment of the lead agency in your collaborative/partner network. How do you wish to proceed on this matter?

Please see our response to Question 3 above. In addition, please accept the following correction to the last sentence in our response to RFP Question 3.2(b): "However, 211 LA may designate a network partner to ~~serve in this capacity~~ **assist with this task** when appropriate."

8. Regarding your response to Question 3.3, would other counties and/or the CPUC be paying for the expanded utilization of inContact? If so, how much? If not, who is paying?

No. As stated in our response to RFP Question 3.3, "There is no additional cost for implementing or maintaining the inContact telephony system, activation fees for hourly direct services include per minute usage rates." What we were trying to convey is that there are no setup charges or maintenance fees for the CPUC or the 19 counties associated with 211 LA and our network partners using inContact under our existing

service agreements to provide disaster-only 2-1-1 services. To clarify the second part of the quoted sentence, the only fees related to inContact, which would apply only in the event that a county activates the disaster-only 2-1-1 network, are per minute usage fees that have been incorporated into the hourly rates in the activation pricing schedule set forth in our response to RFP Question 3.7.

9. Regarding your response to Question 3.5:

a. Please expand on how these costs are derived.

Direct Service Staff		
\$40/hr.	2 hrs./drill	
\$80/ staff	3 staff/site	
\$240/ site	6 sites	\$ 1,440.00
Program Management Staff		
\$85/hr.	5hrs./drill	
\$425/site	6 sites	\$ 2,550.00
Development - scenario, simulation, and activity (6 hrs.)		\$ 510.00
Network Coordination - scheduling, staff assignments, and agency prep. (8 hrs.)		\$ 680.00
Follow-up/Debrief - Network debrief, capture what worked and need for adjustments (2 hrs.)		\$ 170.00
Revisions - Revise activity as needed (5 hrs.)		\$ 425.00
Reporting - Prepare and distribute the After Action report (6 hrs.)		\$ 510.00
Cost per drill/activity		\$ 6,285.00
Annual cost for two drills/preparedness activities		\$ 12,570.00

b. Who assigns the user permissions on the Disaster Portal? Can they be changed, and if so, how?

211 LA will manage the Disaster Portal and user groups. In addition, the 19 counties will have designated administrator/county representative (CR) users. CRs will have the ability to manage their county's authorized users, including adding or removing users.

10. Question 3.6 is asking about public-facing websites that your collaborative is proposing. What form would these public-facing websites take, would they be customized by county, who controls them, how is information loaded, what are the costs, etc.?

Under our proposal, the public-facing website is a component of the Disaster Portal. The Disaster Portal is a shared website portal for all 19 counties. The Disaster Portal can be customized; however, the 19 counties would have to agree to those customizations. Control of the Disaster Portal is discussed in our responses to Question 9(b) above and RFP Question 3.6. (Please also see the table on page 22 of our proposal.) Information can be loaded onto the Disaster Portal by the counties' authorized users directly or emailed to 211 LA and loaded by our trained professionals. A cost breakdown for the Disaster Portal is set forth in Attachment 1 to our proposal.

11. Regarding your response to Question 3.7, SB 1212 funds cannot be used for ongoing costs.

Question 3.6(c) specifically requests: "Costs of implementation and *ongoing costs* by year for the first three years." The only "ongoing costs" in our proposal are annual maintenance costs for the first three years, which we believe are properly viewed as "one-time costs to help close 2-1-1 service gaps in counties lacking access to disaster preparedness, response, and recovery information and referral services" and are thus recoverable under Pub. Util. Code § 280(g).¹

12. Regarding your proposed budget:

- a. What is the "indirect rate" line item listed above "Total Project Costs for 3 Years"?

Indirect costs are overhead costs that are not directly attributable to specific projects, facilities, functions or products. Indirect costs include administration, human resources, and accounting. An indirect cost rate is simply a device for determining fairly and expeditiously the proportion of general (non-direct) expenses that a project will bear. The proposed budget submitted included a standard 12% indirect rate, with the resulting indirect cost amounts for the first three years listed in the proposed budget.

- b. There are many blank rows and aggregated amounts. For example, there are blank spaces in Items 2 through 6, while there is seemingly an aggregated amount in the costs line. Please give a full breakdown of costs per line item and attach any necessary supporting materials for us to understand your response.

¹ The "activation costs" identified in our response to RFP Question 3.7 are per incident costs, *not ongoing costs*; that is why we have presented these costs as a separate item, with the proposed fee schedule only applying upon the activation of the disaster-only 2-1-1 service network and only if reimbursement is requested (see Attachment 1: Budget).

These sections were blanked out because there are no costs associated with these items (e.g., because they require other data such as number of years or a product reference, or they are not applicable to our proposed approach to providing disaster-only 2-1-1 service). The full cost of the proposal is broken down in the manner structured in the RFP. We have attempted to pull all the relevant cost data into a single page view, even though this was not a requirement of the RFP. A more detailed breakdown of the budget is provided under 12d. below.

In order to provide a further response on this point, we ask that you please specify which items in 2-6 that you need us to provide further information.

- c. Other than the switching costs, how were the proposed budget's numbers derived?

211 LA's cost estimates are based on extensive past practice. Our agency has nearly 40 years of experience contracting, invoicing, tracking, and reporting on disaster related activities for multiple county and federal level programs. We have also built many websites for our organization and many others. We manage over 20 contracts for I&R and special hotlines every year and handle anywhere from 3-4 disaster events every year all of which we manage, execute, and invoice for.

- d. Why does operating a website require \$375,000?

The cost to design and develop the Disaster Portal and perform the systems integrations with iCarol and 211LinQ is \$350,000 and \$25,000 per year to maintain. A cost breakdown is provided below.

- **Development Year 1: Total \$350,000**
 - Project planning: \$25,000 (internal: ~210 hours @ \$120/hr.; research and discovery, functional specifications, business requirements)
 - Creatives: \$20,000 (internal: ~165 hours @ \$120/hr.; UI/UX and visual designs)
 - Development & QA: \$275,000 (internal: ~2,300 hours @ \$120/hr.; Development and quality assurance)
 - Infrastructure Setup & Deployment: \$20,000 (internal: ~165 hours @ \$120/hr.; server/database configurations, deployment and post-launch QA)
 - Website Portal usage training: \$10,000 (internal: ~120 hours @ \$85/hr.; 211 LA staff training on usage of the Portal during disaster incidents)
- **Maintenance Year 1: Total \$25,000**
 - Infrastructure upkeep: \$5,000 (internal: server/database hosting, security updates, load balancing)

- Admin support: \$5,000 (internal: ~60 hours @ \$85/hr; communications, trainings, onboarding new users)
- Feature updates: \$15,000 (internal: ~125 hours @ \$120/hr; adjusting any features based on user feedback, creating new forms and features, modifying, updating existing features)
- **Maintenance Year 2: Total \$25,000**
 - Infrastructure upkeep: \$5,000 (internal: server/database hosting, security updates, load balancing)
 - Admin support: \$5,000 (internal: ~60 hours @ \$85/hr.; communications, trainings, onboarding new users)
 - Feature updates: \$15,000 (internal: ~125 hours @ \$120/hr.; creating new features, modifying, updating existing features)
- **Maintenance Year 3: Total \$25,000**
 - Infrastructure upkeep: \$5,000 (internal: server/database hosting, security updates, load balancing)
 - Admin support: \$5,000 (internal: ~60 hours @ \$85/hr.; communications, trainings, onboarding new users)
 - Feature updates: \$15,000 (internal: ~125 hours @ \$120/hr.; creating new features, modifying, updating existing features)
- e. **What is the purpose of the activation fee? What does it pay for? What if counties are unable or unwilling to pay an activation fee?**

As detailed below, there are numerous incremental and variable costs associated with activating the disaster-only 2-1-1 network and the network's provision of 2-1-1 service during a disaster (e.g., fees for translation services). While 211 LA and its network partners are non-profits, we are not staffed by volunteers; rather, we employ highly trained, paid I&R professionals when responding to a disaster. Those costs need to be recovered somehow. At the same time, we recognize the need to minimize the potential costs to the 19 counties that would be served by the disaster-only 2-1-1 network. For that reason, we propose a cost-effective technology approach featuring the Disaster Portal for information sharing and posting. Under our proposed approach, the 19 counties would only be charged: (a) the activations fees that would apply only in the event of a disaster and activation of the disaster-only 2-1-1 network; and (b) the hourly rates associated with the disaster-only 2-1-1 network's provision of services during a disaster.

Activation activities include but are not limited to:

- Initial communication with Counties for activation
- Clarification on the type of disaster/event
- Activation of IVR and recording of IVR information

- Initial resource curation and population of database
- External communication set up (social media)
- Forecasting volume and estimation of contact handling capacity needed
- Determine which partners will assist and what activities they will take on
- Staff scheduling and recruiting for additional time and overtime
- Initial staff communication on the disaster response and expectations
- Establish activities time tracking for proper invoicing and accounting

In the event of a state or federally *declared* disaster, the county or counties that activated the network will likely be able to secure funds from FEMA to cover the aforesaid fees and charges. However, there may be instances where the network is activated but the disaster does not meet the criteria for a declared disaster, and thus FEMA reimbursement funds may not be available. For such cases, we recommend that any otherwise unused SB 1212 funds be earmarked for such purposes. In addition, as previously discussed with the Commission, 211 LA and its network partners plan to work with the 19 counties and other interested parties to secure longer-term sources of funding to cover or at least defray the costs associated with maintaining and activating the disaster-only 2-1-1 network after the termination of SB 1212's funding provisions.

13. Regarding Attachment 2:

- a. Why is the power of activating service concentrated on one county official? What procedures are in place if the designated official is not available?

Each County Representative (CR) can designate as many agencies or people as they want to be authorized users that can activate the disaster-only 2-1-1 service network.

- b. In the deactivation section, how does the "short -term recovery phase" coincide with a declared emergency period? If it does not coincide with a declared emergency, does it coincide with some other schedule?

It doesn't. The disaster-only 2-1-1 network must be activated and then deactivated by an authorized user. Deactivation occurs when the county that activated the network decides the network's services are no longer needed for the disaster in question.

14. What alternative funding streams will 211 LA County and its partners rely on if SB 1212 funds are unavailable for use (e.g., aspects of the proposal not qualifying for funding)?

We are offering our expertise and services, as outlined in the proposal, to develop and support the operation of a disaster-only 2-1-1 network. We are not in a position to take

on those tasks without the SB 1212 funding specified in our proposal. We believe that all the costs identified in our proposal are eligible for SB 1212 funding. However, as discussed in our response to Question 12.e above, we also plan to work with the CPUC, the 19 counties and other interested parties to secure additional, non-SB 1212 funding sources to cover the costs associated with maintaining and operating the disaster-only 2-1-1 network, particularly after the expiration of SB 1212's funding provisions.

Sincerely,



Maribel Marin
Executive Director
211 LA
526 W. Las Tunas Drive
San Gabriel, CA 91776

626.350.1841
www.211la.org